



August 11, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ref: Subscriber Notification Report for South Carolina Net, Inc. dba Spirit Telecom
FCC 499 Filer ID # 809084
WC Docket No. 05-196

South Carolina Net, Inc. dba Spirit Telecom (Spirit) is a certified CLEC in South Carolina and North Carolina. Our corporate headquarters is located at 1500 Hampton Street, Suite 101, Columbia, South Carolina 29201. In the past five (5) years, Spirit has primarily sold CLEC services to businesses in South Carolina. Until April 2005, Spirit operated a facility-based CLEC in Columbia, SC, Senate Street office only, utilizing a Nortel DMS 500 located at 1426 Main Street, 20th floor, Columbia, South Carolina 20201. Spirit business customers in the rest of the state were sold local services utilizing either wholesale UNE-P or resell services with BellSouth or resell agreements with other facility-based CLECs.

Spirit's Engineering and Planning staff spent 2003 and 2004 analyzing the most cost effective and versatile local platform to install to migrate existing UNE-P clients as well as sell additional facility-based services throughout South Carolina and into neighboring states. An RFP for a soft switch and feature server was developed and released, responses received and analyzed, and a decision made.

Spirit installed a Telica Soft switch and Broadsoft Feature Server (VoIP Local Switch or VLS) in the past year. Spirit is currently in the process of interfacing a new OSS solution consisting of a Telegea provisioning system and MCL billing system with the soft switch and feature server. The OSS solution is being deployed in August 2005.

Up to this point in time, Spirit has populated the VLS with standard telephone numbers from two sources.

1. For markets where Spirit could justify traditional facility-based build outs (all in SC currently), we applied for and received specific NNXs in rate centers across the State. Spirit currently has numbers assigned to us in nineteen (19) rate centers in South Carolina. In each of these rate centers, Spirit also has provisioned traditional duplicate facilities into the appropriate Routers and PSAPs for E911 service.

2. For markets outside of our traditional footprint, Spirit signed an agreement with Level 3 to utilize their Expanded Local Service (ELS) offering. The ELS service provides access to local numbers across the country, which includes traditional E911 capability to the appropriate PSAP.

Spirit began installing new business customers utilizing the Telica and BroadSoft in April 2005. From an Enterprise or direct sale perspective, the vast majority of the accounts installed to date were sold bundled services via standard DS1 interfaces utilizing traditional Time Division Multiplexing (TDM) transmission technology. While the dial tone and customer line the soft switch provides features, the services are delivered as analog services, not IP. The lines are terminated into legacy phone systems, Key Systems and Private Branch Exchanges (PBXs), and are not mobile in any way. Since these customers are not IP but TDM, and are provided traditional E911 services based on a valid service address, no notification was warranted. Other than the system that provides the dial tone, there is not any difference between these clients and thousands of other businesses whose service is provided via a DS1 interface by RBOCs and CLECs across the country.

On the IP side, Spirit is just beginning to deploy accounts that could be considered mobile per the FCC order.

- Spirit has deployed two (2) IP Centrex type accounts. Per the FCC order, Spirit developed a specific form that explains the limitations Spirit has in relation to the E911 service provided on the IP Centrex lines. This form was hand delivered to the two (2) existing accounts, covered with the responsible party at the business, and a signature of acknowledgement obtained. A copy of the form with the acknowledgement was left with the customer for their files, with the original placed in the customers file in our Customer Service Department. We will also keep a copy in a separate IP customer file for quick reference. Stickers were created for any Customer Premise Devices (CPE) that we have deployed or will deploy in the future. Stickers, along with instructions, were delivered to existing accounts. On IP accounts implemented after July 28th, Spirit will place the stickers on any CPE deployed prior to delivery and have the acknowledgement of 911 limitations signed prior to service delivery.
- Spirit has not launched a Residential/Small Office Home Office (SOHO) offering at this time. As our new OSS solution evolves, a self sign-up portal will be developed with 911 limitations prominently displayed, and with an electronic requirement to acknowledge those limitations prior to proceeding with the self sign-up process. Stickers will be applied to any CPE shipped.

With the small number of active IP subscribers, 100% of the subscribers were covered with the 911 limitations document and 100% of them acknowledged the notification. The

acknowledgement forms will be kept in a hard copy form in our Customer Service Department until such time as our OSS platform is capable of storing and retaining an electronic acknowledgement signature.

For future development and focusing on FCC November 28th compliance, Spirit has signed a five (5) year contract with Intrado, Inc. for their V911 solution. Implementation is underway, encompassing both Information Services (IS) and Operations development, and should be completed and the service launched by late October. The Intrado solution, front-ended by Spirit web pages, will allow the mobile IP client to update their current location for 911 purposes within a few minutes.

The person responsible at Spirit Telecom for Compliance efforts with the VoIP E911 Order is:

Mark Stokes
Director Business Development
Spirit Telecom
1500 Hampton Street, Suite 101
Columbia, South Carolina 29201
803-726-4003
mark.stokes@spirittelecom.com

Copies of the Spirit Notification Letter and the CPE 911 Limitations sticker are attached for your review and information.

Sincerely,

Mark S. Stokes

Mark S. Stokes
Director Business Development
Spirit Telecom



August 11, 2005

Dear Customer:

The Voice Over IP (VoIP) telephone or Access Terminal Adapter (ATA) that Spirit Telecom has installed or mailed to you provides E911 emergency services from the physical address you listed when you signed up for service, such as your home or business. Currently, the 911 services do not work if you take your VoIP telephone or ATA to another address.

E911 is used to request emergency assistance and provides fast and easy access to local emergency response centers, where 911 calls are received and then routed to the proper emergency services, which then dispatches the appropriate service such as fire, police or EMS.

In addition, your VoIP telephone will not work if your electricity fails or if your Internet connection fails.

The Federal Communications Commission (FCC) requires that we notify you of these shortcomings and provide you a warning sticker, which is enclosed. FCC regulations require that you place the sticker in a prominent spot on your telephone or VoIP access device.

Although you cannot control a power outage affecting your service, we recommend that you use an Uninterruptible Power Supply (UPS) to continue to provide AC power to your broadband connection and to your VoIP access device.

In the near future we will be able to provide 911 services from any location, giving you the mobility available through a broadband connection and a VoIP telephone. If you are a customer when we provide the feature, we will notify you of its availability.

Sincerely,

Teena Frazer

Manager – Customer Service

Spirit Telecom

Customer Acknowledgement

I understand and acknowledge the receipt of this document regarding my IP service and understand the current limitations of my 911 emergency capabilities.

Customer Name

Authorized Individual's Name (Printed)

Authorized Signature

IP Lines Installed

Sticker Samples

911 WARNING

The 911 emergency service from this phone **will only work if you use it from the address where you registered it**, such as your home or business.

It will not work if you:

Move this phone to another address
Your electricity fails
Your Internet connection fails

911 WARNING

The 911 emergency service from this phone **will only work if you use it from the address where you registered it**, such as your home or business.

It will not work if you:

Move this phone to another address
Your electricity fails
Your Internet connection fails